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CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA  
cr-93

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

VS.

BRADLEY SHANE JENSEN,

Defendant.

Criminal No. 4:13-cr-93

INDICTMENT

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(b)(2)

18 U.S.C. § 2253

18 U.S.C. § 2256

## THE GRAND JURY CHARGES:

## COUNT 1

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about February 29, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, namely a video involving sexually explicit conduct between an adult male and a minor female believed to be approximately 5 years old, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about February 28, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely a video of a minor female believed to be approximately 5 years old lasciviously exhibiting her genitals and pubic area, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about December 10, 2011, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of an adult male engaging in oral-genital sexual intercourse with a female infant, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 4**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about December 10, 2011, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of an adult male using the mouth of an infant to perform oral-genital sexual intercourse upon his penis, with a baby bottle visible in the image, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 5**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about January 2, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of an adult male lasciviously exhibiting his genitals by placing his penis at the vaginal opening of a female infant, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 6**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about January 2, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of an adult male lasciviously exhibiting his genitals male by placing his penis at or in the mouth of a female infant, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 7**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about January 2, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely the lascivious display of the genitals of an infant female, covered with what appears to be semen, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 8**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about February 3, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of a minor female, believed to be approximately 5 years old, with her legs spread and lasciviously exhibiting her genitals, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 9**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about February 3, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of a minor female, believed to be approximately 5 years old, with her legs pulled up toward her face, thereby lasciviously exhibiting her genitals, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 10**

**(Sexual Exploitation of a Child/Production of Child Pornography)**

On or about February 3, 2012, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely an image of a minor female, believed to be approximately 5 years old, with her legs pulled up toward her face, lasciviously exhibiting her genitals, with the penis of an adult male placed near or in her vaginal opening, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 11**

**(Receipt of Child Pornography)**

On or about between April 11, 2013, and April 26, 2013, in the Southern District of Iowa, defendant BRADLEY SHANE JENSEN, did knowingly receive one or more visual depiction(s) using a means or facility of interstate or foreign commerce or that had been shipped and transported in interstate and foreign commerce, by any means, including by computer, the producing of such visual depiction(s) involving the use of minors, that is, a person under the age of eighteen years, engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and said visual depiction being of such conduct.

This is a violation of Title 18, United States Code, Sections 2252(a)(2) and 2256.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 12**  
**(Possession of Child Pornography)**

On or about May 28, 2013, in the Southern District of Iowa, defendant BRADELY SHANE JENSEN, did knowingly possess at least one matter which contains a visual depiction that had been shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate commerce, or which was produced using materials that had been mailed, or so shipped or transported by any means including by computer, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and said visual depictions being of such conduct, including visual depictions of prepubescent minors who had not attained the age of 12 years.

This is a violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2), and 2256.

**THE GRAND JURY FURTHER FINDS:**

The defendant, BRADLEY SHANE JENSEN, committed the felony offenses involving a minor charged in Counts One through Ten at times when he was required by federal and other laws to register as a sex offender.

Therefore, Title 18, United States Code, Section 2260A is applicable.

**THE GRAND JURY FURTHER FINDS:**

**NOTICE OF FORFEITURE**

If the defendant, BRADLEY SHANE JENSEN, is convicted of any of the offenses alleged in Counts 1 through 12 of this Indictment, the defendant shall forfeit to the United States his interest in the following property:

- a. Any and all visual depictions of minors engaging in sexually explicit conduct, including any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110.
- b. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

This is pursuant to Title 18, United States Code, Section 2253.

**A TRUE BILL.**

/s/  
FOREPERSON

Nicholas A. Klinefeldt  
United States Attorney

By: /s/  
Craig Peyton Gaumer  
Assistant United States Attorney